

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the
DEPARTMENT OF STATE, ET AL.,

Defendants.

CIVIL ACTION
CASE NO. 1:25-cv-10685-WGY

**MOTION FOR LEAVE TO FILE REPLY BRIEF
BY PROPOSED INTERVENORS THE INTERCEPT
AND THE CENTER FOR INVESTIGATIVE REPORTING**

In accordance with Local Rule 7.1(b)(3), Intercept Media, Inc. and The Center for Investigative Reporting, Inc. (collectively, “Proposed Intervenors”) seek leave to file the attached reply brief, which is less than five pages, in support of their Motion to Intervene and for Access to Judicial Records, ECF Nos. 288, 289. Defendants do not consent to this motion for leave.

Defendants’ response to Proposed Intervenors’ Motion was filed on December 12, 2025. Proposed Intervenors respectfully submit that this additional briefing will assist the Court in resolving the pending Motion by allowing Proposed Intervenors to reply concisely to assertions about this case’s procedural history and to legal arguments raised for the first time in Defendants’ response.

Respectfully submitted,

INTERCEPT MEDIA, INC. and
THE CENTER FOR INVESTIGATIVE
REPORTING, INC.

By their attorneys,

December 19, 2025

/s/ Robert A. Bertsche

Robert A. Bertsche (BBO #554333)
KLARIS LAW PLLC
6 Liberty Square #2752
Boston, MA 02109
Telephone: 857-303-6938
rob.bertsche@klarislaw.com

Renee M. Griffin*
rgriffin@rcfp.org
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th Street NW, Suite 1020
Washington, DC 20005
Telephone: (202) 795-9300
rgriffin@rcfp.org
**Pro Hac Vice* appl. Pending

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: December 19, 2025

By: Robert A. Bertsche
Robert A. Bertsche (BBO #554333)
KLARIS LAW PLLC
6 Liberty Square #2752
Boston, MA 02109
Telephone: 857-303-6938
rob.bertsche@klarislaw.com